

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

CHRISTOPHER COLLINS,
CAMERON COLLINS, and
STEPHEN ZARSKY,

Defendants.

18 Cr. 567 (VSB)

**NOTICE OF CHRISTOPHER COLLINS' MOTION TO COMPEL
LIMITED PRODUCTION OF MATERIALS
BEARING ON THE SPEECH OR DEBATE CLAUSE OF THE CONSTITUTION
AND LOCAL RULE 16.1 STATEMENT**

PLEASE TAKE NOTICE THAT Christopher Collins, defendant in the above-captioned action, hereby presents this motion seeking an order compelling the production of materials bearing on the Speech or Debate Clause of the United States Constitution (the "Motion");

PLEASE TAKE FURTHER NOTICE that the Motion is made and based on this Notice of Motion, the annexed Memorandum of Law filed concurrently in support hereof, the Declaration of Kendall Wangsgard, Esq., and on such other pleadings, records, oral and documentary evidence and arguments as may be presented to the Court; and

PLEASE TAKE FURTHER NOTICE that any opposition to the Motion must be filed on or before March 8, 2019.

LOCAL RULE 16.1 STATEMENT. It is hereby certified that the Motion is made following conference of counsel to discuss the relief requested. Counsel for the parties have telephonically met-and-conferred on in good faith to resolve by agreement the issues raised by

the Motion. However, the parties have been unable to reach agreement with respect to the issues raised in the Motion.

Respectfully submitted,

New York, New York
February 8, 2019

BAKER HOSTETLER LLP
By: /s/ Jonathan B. New
Jonathan B. New
45 Rockefeller Plaza, 14th Floor
New York, NY 10111
T: 212.589.4200
F: 212.589.4201
jnew@bakerlaw.com

Jonathan R. Barr (*pro hac vice*)
Kendall E. Wangsgard
Washington Square, Suite 1100
1050 Connecticut Avenue, N.W.
Washington, DC 20036
T: 202.861.1500
F: 202.861.1783
jbarr@bakerlaw.com
kwangsgard@bakerlaw.com